

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

**JOINT INFORMATIVE MOTION REGARDING OCTOBER 28, 2021 HEARING ON  
THE DRA PARTIES' URGENT MOTION TO COMPEL**

**To The Honorable United States District Judge Laura Taylor Swain:**

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of debtors the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA,” and collectively with the Commonwealth and ERS, the “Debtors”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> AmeriNational Community

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the bonds issued by the DRA<sup>3</sup> (the “Collateral Monitor,” and together with the Servicer, collectively, the “DRA Parties,” and jointly with the Oversight Board, the “Parties”), by and through the undersigned legal counsel, respectfully jointly submit this informative motion pursuant to the Court’s *Order Setting Procedures for October 28, 2021 Hearing* [ECF No. 18707] and respectfully state as follows.

1. The Parties will appear virtually at the October 28, 2021 hearing (the “Hearing”) to address the *DRA Parties’ Urgent Motion to Compel Compliance with Order Granting Urgent Joint Motion Regarding Rule 30(B)(6) Deposition of the Financial Oversight and Management Board for Puerto Rico* (Dkt. No. 18667) (the “Urgent Motion to Compel”), as well as any objections, responses, statements, joinders, and replies to the Urgent Motion to Compel.

2. The following individuals may appear and speak at the Hearing:

a. Collateral Monitor:

a. Taleah E. Jennings (taleah.jennings@srz.com)

b. Thomas L. Mott (thomas.mott@srz.com)

b. Servicer:

a. Arturo J. Garcia-Sota (ajc@mcvpr.com)

b. Nayuan Zouairabani-Trinidad (nzt@mcvpr.com)

c. Oversight Board:

a. Martin J. Bienenstock (mbienenstock@proskauer.com)

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<sup>3</sup> The DRA bonds were issued pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018.

- b. Margaret A. Dale (mdale@proskauer.com)
- c. Michael T. Mervis (mmervis@proskauer.com)
- d. Julia D. Alonzo (jalonzo@proskauer.com)

3. The Parties have agreed to the following order in which the speakers shall present oral argument:

- a. DRA Parties' Opening Argument: 15 minutes
- b. Oversight Board's Argument: 20 minutes
- c. DRA Parties' Rebuttal Argument: 5 minutes

Dated: October 27, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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***Attorneys for Cantor-Katz Collateral Monitor LLC, as Collateral Monitor for GDB Debt Recovery Authority***

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

/s/ Hermann D. Bauer  
Hermann D. Bauer